Air Quality Permitting
Statement of Basis

September 10, 2008

Tier I Operating Permit No. T1-050032

Chevron Pipe Line Company/Northwest Terminalling Company
Boise, Idaho

Facility ID No. 001-00026

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DRAFT FOR PUBLIC COMMENT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
bbls	barrels
Btu	British thermal unit
CAA	Clean Air Act
CO	carbon monoxide
CFR	Code of Federal Regulations
Chevron	Chevron Pipe Line Company/Northwest Terminalling Company
CAM	Compliance Assurance Monitoring
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
O_3	ozone
PM	Particulate Matter
PM_{10}	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/yr	Tons per year
TOC	Total organic compounds
$\mu g/m^3$	micrograms per cubic meter
UTM	Universal Transverse Mercator
VDU	vapor destruction unit
VES	Vapor Extraction System
VOC	volatile organic compound
VOL	volatile organic liquid

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Chevron Pipe Line and Northwest Terminalling Company (Chevron) regarding the operation of its facility located in Boise. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.300.

2. FACILITY DESCRIPTION

Chevron is a petroleum distribution terminal located in Boise. Refined petroleum products are transported to the facility via an underground pipeline system where they are either stored or transferred to another terminal. The equipment at the facility includes petroleum storage tanks, additive storage tanks, truck loading rack and vapor destruction system at NWTC, and an ethanol off loading bay.

3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Refer to Section 6.2 of this document for a complete emissions inventory of the air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.30.

This facility is not a major facility as defined by IDAPA 58.01.01.205 because it does not emit or have the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 4613 for Chevron Pipeline Company and 5171 for the Northwest Terminalling Company. The Aerometric Information Retrieval System (AIRS) facility classification is A. The AIRS information can be found in Appendix A of this statement of basis.

The facility is located in Boise, which is classified as attainment or unclassifiable for all regulated criteria air pollutants (PM_{10}, CO, NO_x, SO_2, lead, and ozone). There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 64 and Universal Transverse Mercator (UTM) Zone 11.

4. APPLICATION SCOPE

This application is for a renewal of the facility's Tier I operating permit issued on July 16, 2003. Additionally, on July 31, 2008, the permittee requested by email from DEQ to remove permit conditions associated with the Soil Vapor Extraction System (VES) and the VES at the Norwood Street existing at Chevron's Tier I operating permit issued on July 16, 2003. The VESs are no longer operational at the facility. In the inspection report that DEQ conducted at the facility on April 16, 2008, it was confirmed that these sources were not operational from 2006 to April 16, 2008. Therefore, based on the permittee request, DEQ removed these two sources from the renewed Tier I operating permit.

5. SUMMARY OF EVENTS

June 17, 2005	DEQ received the Tier I application
August 15, 2005	DEQ determined the application complete
February 25, 2008	DEQ received supplemental information from Chevron
July 23, 2008	DEQ received supplemental information from Chevron
July 31, 2008	DEQ received correspondence from Chevron regarding removal of the VESs from the site

5.1 Permitting History

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from July 16, 2003 to December 19, 2005. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active in effect (A) or superseded (S).

November 30, 2007	X-2007.0176, PTC exemption concurrence for gasoline containing 10% ethanol (E-10) to storage tank 209 at NWTC. (A)
July 16, 2003	Tier I Operating Permit No. T1-020015, issued 7/16/2003. This permit replaced the initial Tier I Operating Permit No. 001-00026, issued December 19, 2000. (A, however, status will become "S" upon issuance of this permit)
March 17, 2003	PTC No. 001-00026, issued 3/17/2003. This PTC replaced PTC No. 001-00026, issued August 28, 1990. (S)
December 19, 2000	Tier I Operating Permit No. 001-00026, issued December 19, 2000. (S)
August 28, 1990	PTC No. 0020-0026, issued August 26, 1990. (S)
April 29, 1983	PTC issued to Chevron Pipe Line on April 29, 1983. (S)

6. PERMIT ANALYSIS

6.1 Basis of Analysis

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- PTC No. 001-00026, issued 3/17/2003
- Tier I Operating Permit No. T1-020015, issued 7/16/2003
- Tier I Operating Permit application received on 6/17/2005
- Compliance certification received on 2/28/2008
- Supplemental information received from Chevron on 2/25/2008 and on 7/23/2008
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

6.2 Emissions Description and Emissions Inventory

Emission sources at the Boise Terminal can be attributed to Chevron Pipe Line Company (CPL), Northwest Terminalling Company (NWTC), or both.

Chevron Pipe Line Company

The CPL includes the following sources: fixed roof storage tanks, floating roof storage tanks, and fugitive VOC emissions.

Fixed roof storage tanks: There are ten above ground fixed roof storage tanks at CPL that contain refined petroleum products and/or contaminated water. These tanks range in size from 1,000 barrels (bbls) to 65,774 bbls (one barrel equals 42 U.S. gallons) working capacity. All tanks are vertical and contain jet fuel, diesel fuel, transmix, or contaminated water.

Floating roof storage tanks: There are ten above ground floating roof storage tanks at CPL that contain refined petroleum products. These tanks range in size from 13,208 bbls to 60,986 bbls working capacity. All the tanks are vertical and contain either gasoline or diesel fuel. Tanks 164, 203, 204, 205, 206, and 207 are swing tanks and may contain gasoline, diesel, or jet fuel depending on need.

Fugitive VOC emissions: Fugitive emission sources at marketing terminals and pipeline facilities are generally defined as VOC emission sources not associated with a specific process, but scattered throughout the facility. These sources include storage tanks, valves of all types, flanges, pump, and compressor seals. Fugitive VOC emissions are attributable to the evaporation of petroleum liquids and gases. Fugitive emissions from storage tanks are addressed in the storage calculations.

Northwest Terminalling Company

The NWTC includes the following sources: truck loading rack, truck rack vapor destruction system, fixed roof storage tanks, floating roof storage tanks, and fugitive emissions.

Truck loading rack:

In general, loading losses are the primary source of evaporative emissions from tank truck operations. The losses occur as organic vapors in empty cargo tanks are displaced to the atmosphere by the liquid being loaded into the tanks. The truck loading rack at NWTC is a bottom loading rack with a vapor containment and destruction system.

Truck rack vapor destruction unit:

Vapor from the truck loading rack are captured via the vapor containment system and sent to the vapor destruction unit for incineration. The incinerator is supplemented with natural gas and/or ambient air as needed.

Fixed roof storage tanks:

There are 13 above ground fixed roof storage tanks at NWTC that contain refined petroleum products, fuel additives and/or contaminated water. These tanks range in size from 71 bbls to 17,230 bbls working capacity. Nine of the tanks are vertical and contain jet fuel, diesel fuel, transmix, or fuel additives. Four tanks are horizontal and these contain fuel additives.

Floating roof storage tanks:

There are seven above ground floating roof storage tanks at NWTC that contain refined petroleum products. These tanks range in size from 7,694 bbls to 22,046 bbls working capacity. All the tanks are vertical and contain various grades of gasoline, diesel, or jet fuel.

Fugitive VOC emissions:

Fugitive emissions sources at the marketing terminal are generally defined as VOC emission sources not associated with a specific process, but scattered throughout the facility. These sources include storage tanks, valves, pumps, and compressor seals. Fugitive VOC emissions are attributable to the evaporation of petroleum liquids and gases. Fugitive emissions from storage tanks are addressed in the storage calculations.

Emissions Inventory:

The emission inventory for the criteria air pollutants, TAPs, and HAPs were provided by the permittee. The VOC and HAPs emissions from the storage tanks were calculated using U.S. EPA's TANKS program, version 4.09b. Table 6.1 summarizes the criteria air pollutant and hazardous air pollutant emissions from the facility and represent potential emissions. The Tier I operating permit application that was received by DEQ on June 17, 2005, contains a detailed emissions inventory for the sources regulated in the permit.

Table 6.1 EMISSIONS INVENTORY

Source	PM_{10}[a]		NO_x[b]		SO_2[c]		CO[d]		VOC[e]		HAPs[f]	
	(lb/hr)[g]	(T/yr)[h]	(lb/hr)[g]	(T/yr)[h]	(lb/hr)[g]	(T/yr)[h]	(lb/hr)[g]	(T/yr)[h]	(lb/hr)[g]	(T/yr)[h]	(lb/hr)[g]	(T/yr)[h]
CPL – fixed roof tanks	--	--	--	--	--	--	--	--	11.8	51.65	0.31	1.4
CPL - floating roof tanks	--	--	--	--	--	--	--	--	7.5	32.72	0.17	0.76
CPL- fugitive sources[i]	--	--	--	--	--	--	--	--	0.73	3.18	0.12	0.52
Total CPL Emissions	**0.012**	**0.053**	**1.2**	**5.3**	**0.0015**	**0.0064**	**0.74**	**3.2**	**26.25**	**112.55**	**1.22**	**2.68**
NWTC – fixed roof tanks	--	--	--	--	--	--	--	--	2.8	12.45	0.10	0.45
NWTC – floating roof tanks	--	--	--	--	--	--	--	--	10.9	47.65	0.23	0.99
NWTC – truck loading vapor destruction system[j]	--	--	1.4	6.13	--	--	3.5	15.33	11.50	50.3	2.54	11.1
NWTC – fugitive sources[i]	--	--	--	--	--	--	--	--	0.10	0.44	0.02	0.09
Total NWTC Emissions	**0.004**	**0.02**	**1.4**	**6.13**	**0.001**	**0.002**	**3.5**	**15.33**	**25.30**	**110.84**	**2.89**	**12.63**
Total Emissions from CPL & NWTC	**0.02**	**0.07**	**2.6**	**11.2**	**0.003**	**0.008**	**4.24**	**18.53**	**51.55**	**223.39**	**4.11**	**15.31**

a) Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
b) Oxides of nitrogen
c) Sulfur dioxide
d) Carbon monoxide
e) Volatile organic compounds
f) Hazardous air pollutant
g) Pounds per hour
h) Tons per year
i) Fugitive sources are from valves of all types, fittings, flanges, pump, and compressor seals
j) The PM_{10} and SO_2 emissions from the vapor loading destruction system are negligible

7. REGULATORY ANALYSIS

7.1 IDAPA 58.01.01.313.03 – Renewals of Tier I Operating Permits

This permitting action is required to renew the facility's current Tier I operating permit. The application was submitted on June 17, 2005, which is less than the required six months prior to the expiration date of the existing Tier I operating permit.

7.2 New Source Performance Standards (NSPS) – 40 CFR 60

40 CFR 60, Subpart XX- Standards of Performance for Bulk Gasoline Terminals.

In accordance with 40 CFR 60.500(a), the affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid into gasoline tank trucks. Subpart XX applies to the loading rack at the NWTC and requires the affected facility be equipped with a vapor destruction unit (VDU) designed to collect and oxidize the total organic compounds (TOC) vapors displaced from tank trucks during product loading. The TOC emissions are limited to 35 mg/L of gasoline loaded.

40 CFR 60, Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

In accordance with 40 CFR 60.110b, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store volatile organic liquid (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. This subpart applies to storage tanks 202, 203, 204, 206, and A201 at Chevron. This subpart requires the affected facility to keep readily accessible records showing the dimensions of each storage vessel and to keep the records at the site for the life of the source.

7.3 National Emission Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Parts 61 & 63

40 CFR 63, Subpart R- National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

No Maximum Achievable Control Technology (MACT) or NESHAP rules apply to Chevron's Boise Terminal. The 40 CFR 63, Subpart R applies only to those sources that are major source for HAP emissions. The general provisions in 40 CFR 63, Subpart A defines major source as: *any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence* ". According to Chevron's operating permit application, the potential emissions of any single HAP were estimated to be less than 10 T/yr and the potential emissions for two HAPs or more were estimated to be below the major source threshold of 25 T/yr for a combination of two HAPs or more. Thus this facility is considered a minor source of HAP emissions, and therefore the requirements of 40 CFR 63, Subpart R do not apply.

7.4 Compliance Assurance Monitoring (CAM) – 40 CFR 64

The 40 CFR 64.2 (a) states the following: "(a) *General applicability.* Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account."

In addition, 40 CFR 64.2 (b) states the following: "(b) *Exemptions* —(1) *Exempt emission limitations or standards.* The requirements of this part shall not apply to any of the following emission limitations or standards:

(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act."

In accordance with 40 CFR 64 (a) and (b) CAM is not required for this Tier I operating permit for the vapor destruction unit used to control the TOC emissions from the truck loading rack. The vapor destruction unit is exempt from the CAM rules in accordance with 40 CFR 64 (b)(1) because the emissions limitations or standards proposed by the Administrator after November 15, 1990 is exempt pursuant to section 111 or 112 of the Act. The vapor destruction unit was constructed after 1994 and therefore the CAM does not apply to this source. The CAM applicability determination of 40 CFR 64.2 (applicability) performed by Chevron is included in Appendix B of this statement of basis.

8. PERMIT CONDITIONS

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions are identified as "Existing Permit Conditions", and revised permit conditions are identified as "Revised Permit Conditions."

Facility-Wide Conditions

8.1 Emission Unit Description

Facility-wide conditions include facility-wide applicable requirements (permit conditions) such as fugitive emissions, odor, visible emissions, fuel burning equipment, fuel sulfur content, open burning, renovation and demolition, accidental release of chemicals, and recycling and emissions reduction. These provisions generally apply for the whole facility. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit conditions.

Some of the facility-wide conditions were re-ordered or included to match DEQ's updated Tier I operating permit template. DEQ included the fuel-burning equipment particulate matter standard to the facility-wide conditions because it is part of the DEQ's standard facility-wide condition.

Permit Condition 1.15, which identified specific test methods was removed from facility-wide conditions because it is no longer part of DEQ's standard facility-wide conditions.

Truck Loading Rack and Vapor Destruction System at NWTC

8.2 Emission Unit Description

The loading rack at NWTC is a bottom loading rack with a vapor destruction system.
Vapor from the truck loading rack are captured via the vapor containment system and sent to the vapor destruction unit for incineration. The incinerator is supplemented with natural gas and/or ambient air as needed.

The vapor destruction system was manufactured by John Zink; model number is ZTOF. The vapor destruction system was installed in 1994.

8.3 Existing Permit Condition 2.13

Existing Permit Condition 2.13 stated:
The owner or operator shall cross-check each tank identification number obtained in 40 CFR 60.502(e)(2) with the file of tank vapor tightness documentation within two weeks after the corresponding tank is loaded.

8.4 Expanded Permit Condition 3.13

Permit Condition 3.13 contains the NSPS requirements of 40 CFR 60.502(e)(3)(i) and (ii), which states that " the owner or operator shall cross-check each tank identification number obtained in 40 CFR 60.502(e)(2) with the file of tank vapor tightness documentation within two weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

"The owner or operator shall cross-check each tank identification number obtained in 40 CFR 60.502(e)(2) with the file of tank vapor tightness documentation within two weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

(a) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter;
(b) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation cross-check shall be performed semiannually.

If either the quarterly or semiannual cross-check provided in paragraph (e)(3)(i) through (b) of this section reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met".

The original Permit Condition 2.13 in the Tier I operating permit No. T1-020015, which was issued on July 16, 2003 inadvertently did not include the NSPS requirements of 40 CFR 60.502(e)(3)(i) and (ii). This renewed Tier I operating permit was revised to include the NSPS requirements of 40 CFR 60.502(e)(3)(i) and (ii).

8.5 Existing Permit Condition 2.28

Existing Permit Condition 2.28 stated:
Monitoring records and supporting information shall be retained for at least five years from the date of monitoring, sample measurements, report, or application.

Permit Condition 2.28 is redundant to Permit Condition 2.11 in the facility-wide conditions, and thus it is removed from the renewed permit.

On-Site Soil Vapor Extraction System

8.6 Emission Unit Description

This source is not included in the renewed Tier I operating permit. According to the July 31, 2008 email, that was sent from Jim Robbins, Environmental Specialist at Chevron to Harbi Elshafei of DEQ the source has been out of service for many years. Mr. Robbins stated in the email that "we do not anticipate any circumstances where these systems would ever be put into service. Please remove these pieces of equipment from the Tier I (Title V) application that you are processing for our Boise facility." DEQ checked the inspection report that was conducted at the facility on April 16, 2008 and confirmed that the source did not operate since 2006. See Appendix B for the email correspondence from Chevron to DEQ.

8.7 Existing Permit Conditions 3.1 – 3.9

Existing Permit Conditions 3.1-3.9 were removed from the permit because the VES is no longer operating at the facility.

Norwood Street Soil Vapor Extraction System

8.8 Emission Unit Description

Chevron also requested from DEQ to remove this source from the existing Tier I operating permit, per emails from Jim Robbins of Chevron to DEQ. Therefore, DEQ did not include this source in the renewed Tier I operating permit. DEQ checked the inspection report that was conducted at the facility on April 16, 2008, and it indicates that the source did not operate since 2006. See Appendix B for the email correspondence from Chevron to DEQ.

Petroleum product Storage Tanks (202, 203, 204, 206, and A201)

8.9 Emission Unit Description

Tanks 202, 203, 204, and 206 are external floating roof tanks, above ground, and operated by CPL. Tank A201 is vertical fixed roof, above ground, and operated by NWTC. The tanks are subject to 40 CFR 60 Subpart Kb. For more information about the storage tanks, please refer to Section 6.2 of this statement of basis and to Section 2 of the Tier I operating permit application.

8.10 Existing Permit Conditions 5.1 and 5.2

Existing Permit Conditions 5.1 and 5.2 contained the NSPS, Subpart Kb requirements for storage tank A201.

In the permit application that was received from the facility in 2005, Chevron has identified that the NSPS, subpart Kb also apply to storage tanks 202, 203, 204, and 206.

8.11 Revised Permit Condition 5.1 and 5.2

Permit Conditions 5.1 and 5.2 contain the NSPS requirements of 40 CFR 60.116b(a) and b(b) of Subpart Kb to include storage tanks 202, 203, 204, 206 in addition to the storage tank A201 included in the original Tier I permit.

Gasoline Containing 10% Ethanol (E-10) to Storage Tank 209 at NWTC

8.12 Emission Unit Description

Chevron Pipe Line Company applied for Permit to Construct exemption concurrence for gasoline containing 10% Ethanol (E-10) to storage tank 209 at NWTC. Gasoline will be blended with up to 10% by volume denatured ethanol just prior to loading in delivery trucks for distribution of the E-10 gasoline. The existing storage tank 209 was an internal floating roof tank with primary and secondary seals, and emission controls at the gauge well. However because of the need to maintain the pristine nature of ethanol, the floating roof of storage tank 209 was replaced with a fixed cone roof that has an internal floating roof.

This source was installed by Chevron Pipeline Company under a Permit to Construct exemption concurrence granted by DEQ on November 30, 2007.

9. INSIGNIFICANT ACTIVITIES

The insignificant activities identified by Chevron in the application are included in the permit along with the applicable regulatory citation for those activities that were determined insignificant based on size or production rate in accordance with IDAPA 58.01.01.317.01.b. The following activities and emissions units are listed in Section 7 of the Tier I operating permit as insignificant activities under IDAPA 58.01.01.317.01.b.i.

Table 9.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01.b.i Citation
Welding – using not more than one (1) to per day of welding rod.	IDAPA 58.01.01.317.01.b.i.(9)
Space heaters and hot water heaters – using natural gas, propane or kerosene and generating less than five million (5,000,000) Btu/hr.	IDAPA 58.01.01.317.01.b.i.(18)

10. ALTERNATIVE OPERATING SCENARIOS

The facility did not request any alternative operating scenarios.

11. TRADING SCENARIOS

The facility did not request any trading scenarios.

12. COMPLIANCE SCHEDULE

12.1 Compliance Plan

No compliance plan has been developed.

12.2 Compliance Certification

Chevron is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

13. PERMIT REVIEW

13.1 Regional Review of Draft Permit

DEQ provided the draft permit to its Boise Regional Office on August 7, 2008. The regional office did not have any comments regarding the draft permit.

13.2 Facility Review of Draft Permit

DEQ provided the draft permit to Chevron, Boise Terminal for its review on August 13, 2008. The facility provided written comments on the draft permit on September 8, 2008.

13.3 Public Comment

DEQ will provide the draft permit for public comment on September 19, 2008. The public comment period is from September 20, 2008 through October 20, 2008. State of Oregon is within 50 miles of this Tier I Source and is affected states. As such, notification of the public comment period was provided as required by IDAPA 58.01.01.364. Following the public comment period, the EPA will also be provided with a copy of the proposed renewal Tier I operating permit for a 45-day review period per IDAPA 58.01.01.366.

14. ACID RAIN PERMIT

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

16. RECOMMENDATION

Based on the Tier I application and review of state rules and federal regulation, staff recommends that DEQ issue facility draft Tier I Operating Permit No. T1-050032 to Chevron Pipe Line Company and Northwest Terminalling Company for its Boise petroleum products storage and distribution facility. This permit renews the facility's existing Tier I. The permit is made available for public comment as required by IDAPA 58.01.01.364. The project does not involve PSD permitting requirements.

HE/hp Permit No. T1-050032

Appendix A

Chevron Pipe Line Company and Northwest Terminalling Company

Boise

Tier I Operating Permit No. T1-050032

Facility ID No. 001-00026

AIRS Data Entry Form

AIRS/AFS[a] FACILITY-WIDE CLASSIFICATION[b] DATA ENTRY FORM

Facility Name: Chevron Pipe Line Company/Northwest Terminalling Company
Facility Location: Boise
AIRS Number: 001-00026

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO_2	B						B	U
NO_x	B						B	U
CO	B						B	U
PM_{10}	B						B	U
PT (Particulate)	B						B	
VOC	A						A	U
THAP (Total HAPs)	SM						SM	
			APPLICABLE SUBPART					
			Kb, XX					

[a] Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

[b] AIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides).

Appendix B

Chevron Pipe Line Company and Northwest Terminalling Company

Boise

Tier I Operating Permit No. T1-050032

Facility ID No. 001-00026

Correspondence from the Facility
(Applicability Determination of 40 CFR 64, Compliance Assurance Monitoring And a Request from the Permittee to remove the VESs from the Permit)

Email that was received by DEQ from Chevron on 7/31/2008 regarding the VESs at the Boise Terminal

Mr. Elshafei:

As per our discussion on 07/29/07 concerning the Boise Facility, CPL Vapor Extraction System (VES) and the Norwood Vapor Extraction System (VES), these VES systems have been out of service for a many years. We do not anticipate any circumstances where these systems would ever be put into service. Please remove these pieces of equipment from the Tier I (Title V) application that you are processing for our Boise Facility.

Sincerely,

Jim Robbins
Chevron Pipeline Company
(801) 975-2325
Salt Lake City, Utah

Chevron

Global Gas

Chevron Pipe Line Company
2875 S Decker Lake Dr Ste 150
Salt Lake City, UT 84119
Tel 801 975 2320
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February 22, 2008

Idaho Department of Environmental Quality
Attn: Harbi Elshsafei – Air Quality Division
1410 North Hilton
Boise, Idaho 83706

Re: Chevron Pipeline/ Northwest Terminalling - AIRS No. 001-00026
Compliance Assurance Monitoring Applicability Determination - Flare

Dear Mr. Elshafei:

As per our discussions concerning the Compliance Assurance Monitoring (CAM) applicability for the ground level stationary flare located at the Boise facility. I have reviewed and had Environmental Engineer for Chevron review 40 CFR Part 64.

The Flare and Truck Rack was constructed after receiving a PTC and began operation in March of 1994. The flare and truck is, as noted in previous permit technical reviews, subject to Section 111 (NSPS -Subpart XX). In the current permit, several of the conditions and limitations that constitute compliance are required under Subpart XX.

Based on our reviews of the regulation, we believe that 40 CFR part 64 does not apply to the Boise Facility - Flair. To be regulated by the CAM rule, all criteria noted in ((1), (2), (3)) must be satisfied as noted in 64.2 (a) Applicability section. Particularly, we feel that we are exempted from CAM based on 40 CFR Part 64.2(1) and the related exemption as noted in 40 CFR Part 64.2(b)(1).

1) 40 CFR Part 64.2 (a) (1):

§ 64.2 Applicability.
(a) General applicability. Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at
a major source that is required to obtain a part 70 or 71 permit if the unit satisfies
all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt
under paragraph (b)(1) of this section;

(b) *Exemptions*—. (1) *Exempt emission limitations or standards.* The requirements of this part shall not apply to any of the following emission limitations or standards: (i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

Therefore, we feel the Boise Facility Flare does not satisfy subpart (a)(1) of the regulation. Since all of the criteria must be met to be regulated by the CAM rule, this rule does not apply to the Boise Facility Flare.

Should you have any questions, please contact me at (801) 975-2325.

Sincerely,

Jim Robbins
Environmental Specialist